

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2013 JUN 24 PM 3:26

DEPUTY CLERK

UNITED STATES OF AMERICA §
§
v. §
§
JESSICA SALMERON §

Criminal No.
3-13CR-236-M

INFORMATION

The United States Attorney for the Northern District of Texas charges:

Count One
Bank Theft
Violation of 18 U.S.C. § 2113(b)

1. From in or about January 1998, through in or about April 2011, defendant, **Jessica Salmeron**, worked as an employee of Citibank N.A. (“Citibank”) at 6460 MacArthur Blvd., Irving, Texas.
2. Citibank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.
3. In the course of her employment at Citibank, defendant, **Jessica Salmeron**, had access to confidential bank account information, including account numbers, balances, and the account holders’ names.
4. **Jessica Salmeron**, with an intent to defraud Citibank, opened two bank accounts (one checking account and one savings account) under a false name, Erica Chavez (the “Chavez Checking Account” and “Chavez Savings Account”), and

knowingly transferred, credited, and deposited funds from other Citibank and Citibank customer accounts into the Chavez Checking Account and the Chavez Savings Account, without the knowledge, permission, or consent of Citibank or Citibank's customers.

5. In or about December 2010, in the Dallas Division of the Northern District of Texas, the defendant, **Jessica Salmeron**, did take and carry away with intent to steal and purloin approximately \$4,185.33 of money, belonging to and in the care, custody, control, management and possession of Citibank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

6. **Jessica Salmeron** repeated this behavior over several months, eventually taking and carrying away with the intent to steal and purloin approximately \$76,781.41 of money, belonging to and in the care, custody, control, management and possession of Citibank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18 U.S.C. § 2113(b)

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